

# **EXHIBIT 27**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CESAR FERNANDEZ-RODRIGUEZ, ROBER  
GALVEZ-CHIMBO, SHARON HATCHER,  
JONATHAN MEDINA, and JAMES WOODSON,  
individually and on behalf of all others similarly  
situated,

*Petitioners*

-v.-

MARTI LICON-VITALE, in her official capacity  
as Warden of the Metropolitan Correctional Center,

*Respondent.*

No. 20 Civ. 3315

DECLARATION OF ADRIENNE  
ROBERTS

ADRIENNE ROBERTS declares the following under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. My name is Adrienne Roberts and I have been housed at the Metropolitan Correctional Center (“MCC”) since December 12, 2018. My Registration Number is 86411-054. I have been housed in Unit 2 since arriving at MCC.
2. I am 60 years old.
3. I have the following medical conditions: [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]. I have been experiencing a general decline in health. My medication

has been changed at least two different times. My counsel had to request Judge Furman to order BOP medical to return my prescriptions back to what I was being prescribed by my doctors before being incarcerated at the MCC.

4. I was a tobacco smoker for 10 years and was addicted to and smoked crack for 20 years.
5. I am currently prescribed approximately 10 different medications including three inhalers. I have asked numerous times, but have not had any explanation, as to what each medication is, what it is for, and in the case of the inhalers, how to use them.
6. I require dentures to comfortably eat solid food. When I arrived here I was told I had to wait one year before I could see a dentist to get dentures or alternatively have a family member bring the dentures to me when they visited. When a family member did visit and brought the dentures, they were not allowed to bring the dentures into the facility. After 17 months at the MCC, I still do not have dentures. I am still using my gums in an attempt to chew whatever food is provided to me.
7. I am nearsighted and need reading glasses to read. I have been given the wrong prescription glasses by MCC. I have begun seeing spots and my vision has deteriorated since wearing the glasses given to me to read.
8. There are 16 people in my Unit. We are housed in cells, some with four to a room and some with two to a room. A couple of people, like me, are single-celled because of medical conditions. We share three phones, four email terminals, six dining tables, one microwave, one washing machine and two showers.

9. We have been locked down since March 13, 2020. I am in my cell for 21 hours a day seven days a week. I have not been allowed outside to breathe fresh air or see the sun since this lockdown began. I have not had rec on the roof since lockdown. Rec during this lockdown involves watching TV. People who watch TV do not social distance.
10. Four new people joined my Unit in the month of March. In the past week, B Tier flooded and three new people were brought to my Tier in the unit.
11. On April 15, 2020 I was given a surgical mask made of paper to wear. I had to use that one mask for at least a week before I was given a new one. The masks were not washable. On May 11, 2020 I was given a mask made out of cloth and told it was washable. I have not given back my mask to be washed because they do not give back the same mask after washing. I am afraid to put on a mask someone else has worn even if it has been laundered. Almost no other inmates are wearing the cloth masks. They do not fit properly. I am terrified of catching Coronavirus and want people to wear their masks. I used yarn and made string to help tie my mask tighter to my face.
12. An officer brings all of my meals on a cart. I eat in my cell.
13. Sometime in early April another inmate, Loren Piquant, was allowed to become my cellmate even though medical staff was aware that Ms. Piquant already had a fever. I was unaware that Ms. Piquant had a fever. Later when medical staff was in my Unit they saw Ms. Piquant in my cell and asked, "why are you in here". Ms. Piquant was then left in my cell with me overnight. The next evening when medical staff was in my Unit they saw Ms. Piquant still in my cell and said, "you

are not supposed to be in here, you have a fever". The medical staff person then took my temperature, saw that I had a fever, closed the door to my cell and ran away.

14. I was terrified. I now realized that Ms. Piquant had Coronavirus symptoms and I was locked in a cell with her. Panicked, I knew the only way to get taken out of the cell was to act as if I was going to hurt myself. So I began hanging a sheet up. The guards saw this and opened the cell door screaming and yelling. One of the guards had some kind of paint gun and put it to my head.

15. I was put in isolation after that. I was kept in isolation approximately 16 days. While in isolation I was given no masks and no gloves. My temperature was monitored. I had a fever. I asked for medicine. I was told to take the Tylenol I already had prescribed to me. Other than taking and keeping records of my temperature and blood pressure no other medical care was provided.

16. While in isolation, I was given frozen baloney two times a day, cold cereal once a day and sometimes expired potato chips. I was allowed outside for one hour a day and walked around the dorm and used the phone. I was not given anything to clean the phone with before or after I used it.

17. I know of at least five other women that had Coronavirus symptoms. Their names are: Loren, Tiffany, Daia, Santa and Debbie. Loren Piquant and Tiffany Days were given Tylenol and Azithromycin to treat their symptoms. Later they changed Tiffany Days medication from Azithromycin to Doxycycline.

18. When someone in the Unit is sick nothing happens. For three weeks I was told a doctor was coming. Only nurses and physician's assistants ever saw me. Even

before Coronavirus, my health issues required regular checkups with a doctor. I called the Federal Defenders Office asking for help. Eventually, they were able to get a doctor to see me.

19. Currently, if I want to see a doctor I have to put a sick call in through the computer in my Unit. Since lockdown there has been no call out to health services. The computer has not been working since Friday. The doctors do not come to examine or help me.
20. Aside from my previous and regular medical needs, I am scared to complain of symptoms of Coronavirus. I do not want to go back to isolation. Nobody wants to go to isolation - others in my Unit feel the same way.
21. Most officers that were eligible to retire put in for retirement. Many officers are not here anymore because they are sick.
22. Staff members are working in multiple Units. They work shifts from 6am to 6pm or from 6pm to 6am.
23. If I complain of being sick and do get to see a doctor all they do is take my temperature.
24. I was never tested for Coronavirus and I requested a test.
25. I require blood samples to be taken regularly [REDACTED]  
[REDACTED] I was supposed to have a blood sample taken in early March 2020. No sample was taken despite my repeated requests. On May 11, 2020 a physician's assistant came to my cell and attempted to take a blood sample in my cell. I refused and insisted my blood be taken at the medical Unit under more sanitary conditions. After multiple requests I was eventually taken to the medical Unit and

had a blood sample taken. I have not been given my results, [REDACTED]

[REDACTED] or been given any update on my health in general.

26. In my Unit there is black mold in the showers.

27. I see mice everyday, in my Unit and in my cell, and have even seen them in the medical area. I see at least 4 or 5 mice a day. Recently, baby mice have been showing up. There are roaches regularly. There are water bugs daily. There are dust mites and my feet are covered in bites from them.

28. As terrible as the conditions are here at the MCC, I am even more terrified of going to my next designation, the notorious prison in Hazelton, West Virginia.

Executed on: May 22, 2020  
Southport, Maine

As reported by Adrienne Roberts to  
Jacob B. Mitchell

/S/  
Attorney for Adrienne Roberts